

1 THE HONORABLE JAMES L. ROBART
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9 UNITED STATES DISTRICT COURT
10 WESTERN DISTRICT OF WASHINGTON

11 KATHERINE MOUSSOURIS, HOLLY
12 MUEENCHOW, and DANA PIERMARINI,
13 on behalf of themselves and a class of
those similarly situated,

14 Plaintiffs,

15 v.

16 MICROSOFT CORPORATION

17 Defendant.

18 Case No. 2:15-cv-01483-JLR
19 ORDER

20 **JOINT PROPOSAL RE: BRIEFING
21 SCHEDULE FOR CLASS
22 CERTIFICATION AND EXPERT
23 WITNESSES**

JLR

1 Pursuant to the Court's February 15, 2017 Order (Dkt. 141), the parties are to submit a
2 proposal for the briefing schedule on class certification and expert witnesses by April 14, 2017,
3 the date on which Plaintiffs will submit their reply in support of their pending motion to compel
4 documents withheld for attorney client privilege and/or work product. (Dkt. 147.)

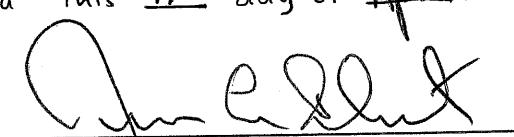
5 The parties respectfully alert the Court that the unknown timing of pending events would
6 likely cause the parties to propose a schedule farther out than they or the Court might prefer.
7 Two 30(b)(6) depositions – on the topics of internal gender audits and internal employee
8 complaints - have been put on hold until the motion is resolved, and should the Court grant the
9 motion in full or in part, Microsoft will have to produce more documents before the depositions
10 take place. This is the only outstanding pre-class certification discovery,¹ and the time period to
11 complete pre-class certification discovery is otherwise closed.

12 Once the parties know the outcome of the Court's order on Plaintiffs' motion to compel,
13 they can make an informed proposal as to how much time will be needed to complete the two
14 30(b)(6) depositions, produce documents in the event the Court grants Plaintiffs' motion, and
15 prepare the class certification and expert witness materials. The parties therefore propose that
16 they jointly submit a proposed schedule within three business days after the Court rules on the
17 motion to compel.

18 It is so ordered.

19 Dated: April 8, 2017

20 Dated this 11th day of April, 2017

21 
22 James L. Robart
23 UNITED STATES DISTRICT JUDGE

24 ¹ On March 14, 2017, Microsoft alerted Plaintiffs that it had identified additional fields of
25 relevant structured data that it intended to produce. Microsoft produced this data on March 21,
26 2017. There may be residual issues as Plaintiffs ask questions to understand and verify the
data. There are also outstanding questions that Plaintiffs have posed to Microsoft regarding data
already produced, and that Microsoft is still working to answer.

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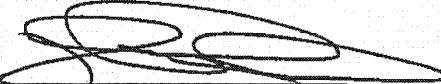
JOINT PROPOSAL RE SCHEDULE
Case No. 2:15-cv-01483-JLR
1344416.2

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JOINT PROPOSAL RE SCHEDULE
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that a true and correct copy of the foregoing and all documents attached
3 hereto were served April 8, 2017 upon counsel of record via service by ECF.

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